

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

PATRICIA LEO HOLLOMAN, et al.,

Plaintiffs,

v.

NEW YORK STATE NURSES ASSOCIATION,

Defendant.

08 CV 00211

MOTION TO ADMIT COUNSEL (CHARLES R. BOTH) PRO HAC VICE

Pursuant to Rule 1.3 of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, David B. Goldstein, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

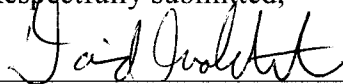
Charles R. Both
Law Offices of Charles R. Both
1666 Connecticut Ave. N.W., Suite 500
Washington, D.C. 20009
202-833-9060
Fax: 202-463-6686

Charles R. Both is a member in good standing of the Bar of the District of Columbia.

There are no pending disciplinary proceedings against Charles R. Both.

Dated: January 10, 2008
New York, New York

Respectfully submitted,




David B. Goldstein, (DG 8291)
RABINOWITZ, BOUDIN, STANDARD, KRINSKY &
LIEBERMAN, P.C.
111 Broadway, Suite 1102
New York, NY 10006-1901
212-254-1111 x 103
(F) 212-674-4614

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PROOF OF SERVICE

I hereby certify that on this 10th day of January 2008, I served a copy of the foregoing Motion to Admit Counsel Pro Hac Vice by regular U.S. Mail, postage prepaid, on the New York State Nurses Association, c/o Registered Agent, Richard Silber, 11 Cornell Rd., Latham, New York 12110-1499.



David B. Goldstein

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

| | | |
|------------------------------------|---|-------------------------|
| PATRICIA LEO HOLLOMAN, et al., |) | |
| |) | |
| Plaintiffs, |) | ___ Civ. ___ |
| |) | |
| v. |) | |
| |) | |
| NEW YORK STATE NURSES ASSOCIATION, |) | AFFIDAVIT OF DAVID |
| |) | GOLDSTEIN IN SUPPORT OF |
| |) | MOTION TO ADMIT COUNSEL |
| Defendant. |) | (CHARLES BOTH) |
| |) | PRO HAC VICE |
| |) | |

State of New York)
) ss:
County of New York)

David B. Goldstein, being duly sworn, hereby deposes and says as follows:

1. I am a member of the law firm of Rabinowitz, Boudin, Standard, Krinsky & Lieberman, P.C., counsel for the Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Charles R. Both as counsel pro hac vice to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in October 1986. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this Court.
3. I have known Charles R. Both since 2007.
4. Mr. Both is now a sole practitioner in Washington, D.C. He was previously a partner

for many years at Yablonski, Both & Edelman in Washington, D.C.

5. I have found Mr. Both to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.
6. Accordingly, I am pleased to move the admission of Charles R. Both, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Charles R. Both, pro hac vice, which is attached hereto.

WHEREFORE it is respectfully requested that the motion to admit Charles R. Both, pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.

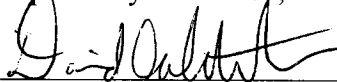
Dated: January 10, 2008
New York, New York

Notarized:

LISA VAZQUEZ
NOTARY PUBLIC-STATE OF NEW YORK
No. 01VA6127362
Qualified in Queens County
My Commission Expires May 23, 2009

Lisa Vazquez 1/10/08.

Respectfully submitted,



David B. Goldstein, (DG 8291)
RABINOWITZ, BOUDIN, STANDARD, KRINSKY &
LIEBERMAN, P.C.
111 Broadway, Suite 1102
New York, NY 10006-1901
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District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

CHARLES R. BOTH

was on the 16TH day of DECEMBER, 1968
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on
December 20, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

| | | |
|------------------------------------|---|--------------|
| PATRICIA LEO HOLLOMAN, et al., |) | |
| |) | |
| Plaintiffs, |) | ___ Civ. ___ |
| |) | |
| v. |) | |
| |) | |
| NEW YORK STATE NURSES ASSOCIATION, |) | |
| |) | |
| Defendant. |) | |

ORDER FOR ADMISSION PRO HAC VICE OF CHARLES R. BOTH
ON WRITTEN MOTION

Upon the motion of David B. Goldstein, attorney for Plaintiffs Holloman, Samuels, and Sheridan-Gonzales, and said sponsor attorney's affidavit in support,

IT IS HEREBY ORDERED that

Charles R. Both
Law Offices of Charles R. Both
1666 Connecticut Ave. N.W., Suite 500
Washington, D.C. 20009
202-833-9060
Fax: 202-463-6686
chas@crbothlaw.com

Is admitted to practice pro hac vice as counsel for Plaintiffs Holloman, Samuels, and Sheridan-Gonzales in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: _____
New York, New York

UNITED STATES DISTRICT/MAGISTRATE JUDGE